

## CERTIFICATE OF TRANSMISSION

I hereby certify that this correspondence (along with any paper referred to as being attached or enclosed) is being submitted via the USPTO EFS Filing System on the date shown below to Mail Stop Appeal Brief-Patents, Commissioner for Patents, P.O. Box 1450, Alexandria, Virginia 22313-1450.

Date: April 4, 2008

/Michelle Pesek/

Michelle Pesek

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re patent application of:

Applicant(s): Henricus Johannes Maria Meijer, *et al.*

Examiner: Kimberly M. Lovel

Serial No: 10/809,171

Art Unit: 2167

Filing Date: March 25, 2004

Title: SYSTEMS AND METHODS THAT TRANSFORM CONSTRUCTS FROM  
DOMAIN TO DOMAIN

**Mail Stop Appeal Brief – Patents**  
**Commissioner for Patents**  
**P.O. Box 1450**  
**Alexandria, VA 22313-1450**

---

**REPLY BRIEF**

---

Dear Sir:

Appellants submit this Reply Brief in response to the Examiner's Answer dated February 7, 2008. A credit card payment form is submitted concurrently herewith, wherein the credit card payment is believed to cover all fees due regarding this document. In the event any additional fees may be due and/or are not covered by the fee submission, the Commissioner is authorized to charge such fees to Deposit Account No. 50-1063 [MSFTP615US].

### **REMARKS**

Claims 1-28 and 30-31 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments and amendments herein.

**A. Rejection of Claims 1-6, 12-16, 18-19, 26 and 30-31 Under 35 U.S.C. §102(e)**

Claims 1-6, 12-16, 18-19, 26 and 30-31 stand rejected under 35 U.S.C. §102(e) as being anticipated by Charlet, *et al.* (US 2005/0160108). Reversal of this rejection is requested for at least the following reasons. Charlet *et al.* fails to disclose all limitations of the claimed subject matter.

The claimed subject matter relates to a system and method that transforms constructs of different type-systems, from one domain to another domain. This enables various components in different domains to seamlessly share tasks or encapsulated business oriented information, as per the needs of the specific domain application. To that end, claim 1 recites a system that maps a first construct of a domain to a second construct of another domain, comprising: *a bank that stores at least one of a set of suppress field labels and a set of introduce field labels; and a mapping component that utilizes at least one of a suppress field label and an introduce field label to facilitate mapping the first construct of a domain to the second construct of another domain.* (claims 13, 18, 30 and 31 recite similar features). Charlet *et al.* fails to disclose such claimed aspects.

Charlet *et al.* describes a method of passing data between an XML document and a hierarchical database, both of which have pre-defined matching hierarchical structures. With more specificity, the indexed raw data from an XML document is transferred to the database or vice-versa, using the representations in the metadata schema for validation. The metadata here, consists of the XSD schema of the document and a database schema, thereby allowing the data of one hierarchical structure to be mapped to another hierarchical structure for the sake of transferring data under a categorized head or element name of a sub-tree.

In contrast, the claimed subject matter relates to systems and methods that transform constructs. For example, the systems and methods can be utilized to transform

a construct from one domain or space to a construct in another domain or space. For example, a construct in the object domain (e.g., an object oriented based artifact) can be mapped to a construct in the markup domain (e.g., a markup language based artifact) or *vice versa*.

In response to Appellants' Representative's assertion that Charlet *et al.* does not disclose a mapping component that utilizes at least one of a suppress field label and an introduce field label to facilitate mapping the first construct of a domain to the second construct of another domain, the Examiner contends that any necessary type or encoding format conversions are performed on the XML document, such that the XML document is not merely sent to the database for storage.

However, the lines cited by the Examiner in Charlet *et al.* teach that the mapping module 206 sends the XML document to the hierarchical database, wherein the XML document is then *configured for storage* in the hierarchical database. Further, an input module can then retrieve the XML document from the hierarchical database in response to a query. Further, the mapping module of Charlet *et al.* maps between XML elements in the XML document such that the XML document can be retrieved in its stored XML format. Thus, Charlet *et al.* is not transforming constructs of different type-systems from one domain to another, but is merely sending an XML document for storage in a database, for later retrieval.

In contrast, appellants' claimed subject matter discloses a mapping component that can introduce and/or suppress entities within a construct's structure to facilitate construct transformation. For example, a first construct can include indicia that is not utilized in a second construct. In these instances, the indicia can be suppressed and/or modified by the mapping component before, during and/or after transforming to the second construct. In addition, such information, although suppressed in the second construct, can be hidden, but retained such that if the second construct is transformed back to the first construct, the original information can be preserved or if the second construct is transformed to a third construct, the original information can be suitably utilized (e.g., hidden, modified and visible). (See pg. 8, line 28-pg. 9, line 5).

Charlet *et al.* merely discloses the transfer of raw data from an XML document classified under field names to a hierarchical database. Charlet *et al.* does not disclose a

system of transforming a construct from one domain or space to a construct in another domain or space, such as, a construct in the object domain (e.g., an object oriented based artifact) mapped to a construct in the markup domain (e.g., a markup language based artifact). Accordingly, Charlet *et al.* is silent with respect to ... *a mapping component that utilizes at least one of a suppress field label and an introduce field label to facilitate mapping the first construct of a domain to the second construct of another domain.*

Furthermore, independent method claims 13 and 18 recite a method that transforms constructs between domains, comprising: ...*employing the mapping to transform the construct of a first domain to a second construct of another domain.*

As stated *supra*, Charlet *et al.* merely discloses the transfer of raw data from an XML document classified under field names to a hierarchical database. Charlet *et al.* does not disclose a system of transforming a construct from one domain or space to a construct in another domain or space, such as, a construct in the object domain (e.g., an object oriented based artifact) mapped to a construct in the markup domain (e.g., a markup language based artifact).

As with method claims 13 and 18, independent claims 30 and 31 recite ...*employing the mapping to transform a first construct of a domain to a second construct of another domain.* Charlet *et al.* merely discloses the transfer of raw data from an XML document classified under field names to a hierarchical database, and does not disclose a system of transforming a construct from one domain or space to a construct in another domain or space.

Thus, it is submitted that Charlet *et al.* does not teach or suggest the elements upon which the Examiner relies, and as a consequence Charlet *et al.* does not teach the identical subject matter in as complete detail as is contained in independent claims 1, 13, 18, 30 and 31 (and the claims that depend there from). Accordingly, this rejection should be withdrawn.

**B. Rejection of Claims 7-8, 10 and 20 Under 35 U.S.C. §103(a)**

Claims 7-8, 10 and 20 stand rejected under 35 U.S.C. §103(a) as being obvious over Charlet *et al.* in view of Dorsett, Jr. (US 6,658,429). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Dorsett, Jr. *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Dorsett, Jr. *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1 and 18 (which claims 7-8, 10 and 20 respectively depend there from). Thus, the claimed subject matter as recited in claims 7-8, 10 and 20 is not obvious over the combination of Charlet *et al.* and Dorsett, Jr. *et al.*, and withdrawal of this rejection is requested.

**C. Rejection of Claims 11 and 21-23 Under 35 U.S.C. §103(a)**

Claims 11 and 21-23 stand rejected under 35 U.S.C. §103(a) as being obvious over Charlet *et al.* in view of Russell *et al.* (US 2004/0039964). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Russell *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Russell *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1 and 18 (which claims 11 and 21-23 respectively depend there from). Thus, the claimed subject matter as recited in claims 11 and 21-23 is not obvious over the combination of Charlet *et al.* and Russell *et al.*, and withdrawal of this rejection is requested.

**D. Rejection of Claims 9, 17, 24, 25, 27 and 28 Under 35 U.S.C. §103(a)**

Claims 9, 17, 24, 25, 27 and 28 stand rejected under 35 U.S.C. §103(a) as being obvious over Charlet *et al.* in view of Meltzer *et al.* (US 6,125,391). It is respectfully submitted that this rejection should be withdrawn for the following reasons. Charlet *et al.* and Meltzer *et al.*, individually or in combination, do not teach or suggest each and every element set forth in the subject claims. In particular, Meltzer *et al.* does not make up for the aforementioned deficiencies of Charlet *et al.* with respect to independent claims 1, 13 and 18 (which claims 9, 17, 24, 25, 27 and 28 respectively depend there from). Thus, the claimed subject matter as recited in claims 9, 17, 24, 25, 27 and 28 is not obvious over

the combination of Charlet *et al.* and Meltzer *et al.*, and withdrawal of this rejection is requested.

**CONCLUSION**

For at least the above reasons, the claims currently under consideration are believed to be patentable over the cited references. Accordingly, it is respectfully requested that the rejections of claims 1-28 and 30-31 be reversed.

If any additional fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063[MSFTP615US].

Respectfully submitted,  
AMIN, TUROCY & CALVIN, LLP

/Himanshu S. Amin/  
Himanshu S. Amin  
Reg. No. 40,894

AMIN, TUROCY & CALVIN, LLP  
24<sup>th</sup> Floor, National City Center  
1900 East 9<sup>th</sup> Street  
Telephone: (216) 696-8730  
Facsimile: (216) 696-8731